

1 Charles D. Naylor
2 **LAW OFFICES OF CHARLES D. NAYLOR**
3 11 Golden Shore Drive, Suite 350
4 Long Beach, CA 90802
5 Email: cnaylor@naylorlaw.com
6 Attorneys for PLAINTIFF

7 Aksana M. Coone
8 **LAW OFFICES OF AKSANA M. COONE**
9 1801 Century Park East, Suite 2400
10 Los Angeles, CA 90067
11 Email: aksana@coonelaw.com
12 Attorneys for PLAINTIFF

13 Jeffrey B. Maltzman, CA Bar No. 131758
14 Edgar R. Nield, CA Bar No. 135018
15 Gabrielle De Santis Nield, CA Bar No. 110930
16 **MALTZMAN & PARTNERS, P.A.**
17 5857 Owens Avenue, Suite 300
18 Carlsbad, CA 92008
19 Telephone: (760) 942-9880
20 jeffreym@maltzmanpartners.com
21 ed@maltzmanpartners.com
22 gab@maltzmanpartners.com
23 Attorneys for Defendant, PRINCESS CRUISE LINES, LTD.

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 SUSAN B. HODGE,

19 Plaintiff,

20 vs.

21 PRINCESS CRUISE LINES, LTD.,
22 SHEVAUN VAN ZYL, M.D., AND
23 DOES 1-10,

24 Defendants.

CASE NO.: 2:24-CV-00620-FLA (ASx)

**JOINT STIPULATION TO
CONTINUE THE COURT
ORDERED PRE-TRIAL AND TRIAL
DATES (ECF NO. 20)**

Trial Date: June 10, 2025

FPTC Date: May 23, 2025

Complaint filed: January 23, 2024

Judge: Hon. Fernando L. Aenlle-Rocha

Magistrate: Hon. Alka Sagar

26
27 Plaintiff, SUSAN B. HODGE, and Defendant, PRINCESS CRUISE LINES,
28 LTD., by and through their Counsel of Record, hereby submit the following

1 Stipulation and agree to Stipulate as follows:

- 2 1. **WHEREAS**, this action was filed on January 23, 2024;
- 3 2. **WHEREAS**, trial is currently set for June 10, 2025;
- 4 3. **WHEREAS**, the final pre-trial conference is currently set for May 23, 2025;
- 5 4. **WHEREAS**, on May 2, 2024 the Court issued a Scheduling Order outlining
- 6 case related dates (ECF No. 20);
- 7 5. **WHEREAS**, the Plaintiff and Princess Cruises are continuing to conduct
- 8 discovery to date;
- 9 6. **WHEREAS**, the Parties have propounded written discovery, and the parties
- 10 have encountered some obstacles in obtaining the plaintiff's out of state
- 11 medical records;
- 12 7. **WHEREAS**, Plaintiff and Princess Cruises have not previously submitted a
- 13 Stipulation to Continue Trial;
- 14 8. **WHEREAS**, the Parties have met and conferred and agree that GOOD
- 15 CAUSE exists to continue the deadlines, including pre-trial and trial deadlines
- 16 in order to avoid prejudice that the Parties will suffer given the upcoming
- 17 holidays and due to the parties having encountered some obstacles in obtaining
- 18 the plaintiff's out of state medical records which are needed prior to taking
- 19 plaintiff's deposition and for defendants' expert review.
- 20 9. **WHEREAS**, this is the first request for extension of the pre-trial and trial
- 21 dates;
- 22 10. **WHEREAS**, based on the foregoing, the Parties respectfully request that this
- 23 Court continue the pre-trial and trial deadlines for 60 days, as set forth below:

24

Matter	Court Order	Requested
25 Trial (Jury)	26 6/10/25 27 at 8:15 a.m. 28 Est. 4 days	8/12/25 at 8:15 a.m. Est. 4 days

Final Pre-Trial Conference [Fridays at 1:30 p.m.]	5/23/25 at 1:30 p.m.	7/25/25 at 1:30 p.m.
Last Day to Hear Motions to Add Parties and Amend Pleadings	8/9/24	---
Fact Discovery Cut-Off [Friday]	1/24/25	3/28/25
Expert Disclosure (Initial)	1/31/25	4/4/25
Expert Disclosure (Rebuttal)	2/14/25	4/18/25
Expert Discovery Cut-Off	2/28/25	5/2/25
Last Day to <u>Hear</u> Motions [Friday] <ul style="list-style-type: none"> • Rule 56 Motion due at least 5 weeks before hearing • Opposition due 2 weeks after Motion is filed • Reply due 1 week after Opposition is filed 	3/28/25	5/30/25
Deadline to Complete Settlement Conference [L.R. 16-15]	4/18/25 Private Mediation	6/20/25 Private Mediation
Trial Filings (first round) <ul style="list-style-type: none"> • Motions in Limine • Memoranda of Contentions of Fact and Law [L.R. 16-4] • Witness Lists [L.R. 16-5] • Joint Exhibit List [L.R. 16-6.1] • Joint Status Report Regarding Settlement 	4/25/25	6/27/25
Trial Filings (second round) <ul style="list-style-type: none"> • Oppositions to Motions in Limine • Joint Proposed Final Pretrial Conference Order [L.R. 16-7] • Joint Agreed Upon Proposed Jury Instructions • Disputed Proposed Jury Instructions • Joint Proposed Verdict Forms • Joint Proposed Statement of the Case • Proposed Voir Dire Questions, if any 	5/9/25	7/11/25

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

THE PARTIES AGREE that GOOD CAUSE exists and the Parties request

1 that the Court continue the Pre-Trial and Trial deadlines as set forth above or to
2 dates convenient to this Honorable Court.

3
4 **IT IS SO STIPULATED.**

5
6 DATED: November 26, 2024

LAW OFFICES OF CHARLES D. NAYLOR

7
8 By: s/ Charles D. Naylor
Charles D. Naylor
9 Attorneys for Plaintiff, Susan B. Hodge

10
11 DATED: November 26, 2024

MALTZMAN & PARTNERS

12 By: s/ Edgar R. Nield
13 Jeffrey B. Maltzman
14 Edgar R. Nield
15 Gabrielle De Santis Nield
Attorneys for Defendant,
Princess Cruise Lines Ltd.

16
17 **FILER'S ATTESTATION**

18 The filing attorney attests that the filing attorney has obtained permission
19 regarding the filing of this document from the signatories of this document. Further,
20 the filing attorney hereby certifies that the content of this stipulation is acceptable to
21 all parties required to sign this stipulation. All parties authorize the filing attorney to
22 affix their CM/ECF electronic signatures to this stipulation.

23
24 DATED: November 26, 2024

MALTZMAN & PARTNERS

25 By: s/ Edgar R. Nield
26 Jeffrey B. Maltzman
27 Edgar R. Nield
28 Gabrielle De Santis Nield
Attorneys for Defendant,
Princess Cruise Lines Ltd.